

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

K.MIZRA LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Case No. 6:20-cv-01031-ADA

**JOINT MOTION TO ENTER CLAIM CONSTRUCTION ORDER**

The parties hereby submit a Proposed Claim Construction Order, attached as Exhibit A hereto, consistent with the Court's Preliminary Claim Constructions communicated to the Parties by Technical Adviser Dr. Yi on August 1, 2021. On August 2, 2021, the Parties notified the Court that upon review of the Court's Preliminary Constructions, the Parties did not believe that oral argument was necessary, and were content to preserve arguments for appeal based on the papers as submitted. The Court accordingly vacated the Markman hearing that had been scheduled August 3, 2021 (ECF No. 37), but has not yet entered a formal Claim Construction Order.

In light of the upcoming deadlines for Plaintiff's Final Infringement Contentions and Defendant's Final Invalidity Contentions pursuant to the Agreed Scheduling Order (ECF No. 43) and subsequent Notice of Agreed Extensions (ECF No. 44), and so that the Parties can finalize their Contentions under the Court's official construction of the claim terms, the Parties request that the Court enter its Claim Construction Order, as proposed and attached by the Parties, formally memorializing the Preliminary Constructions issued on August 1, 2021.

Date: October 7, 2021

Respectfully submitted,

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By:

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*Attorneys for Defendant Cisco Systems, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of October, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Joseph M. Abraham  
Joseph M. Abraham